

JAMI SINGER
FRANCOIS vs VAG

December 13, 2022
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	Page 1		Page 3
1	UNITED STATES DISTRICT COURT	I N D E X	
2	SOUTHERN DISTRICT OF NEW YORK	WITNESS	EXAMINATION BY
3	CIVIL ACTION NO: 1:22-cv-4447-JSR	JAMI SINGER	PAGE
4	FARAH JEAN FRANCOIS,	MS. CATERINE	4, 34
5	Plaintiff,	MR. GOODMAN	15, 35
6	vs.	5	
7		6 E X H I B I T S	
8	VICTORY AUTO GROUP, LLC, d/b/a	7 NUMBER	DESCRIPTION
9	VICTORY SPARTAN AUTO GROUP,	NO EXHIBITS	PAGE
10	LLC, d/b/a VICTORY MITSUBISHI,	8 MARKED	
11	STAVROS ORSARIS, YESSICA	9	
12	VALLEJO, DAVID PEREZ, DIANE	10	
13	ARGYROPOULOS and PHILIP	11	
14	ARGYROPOULOS,		
15	Defendants.		
16	- - - - -		
17	Remote Deposition of JAMI SINGER taken in the	12	
18	above-mentioned matter before Michelle Gruendel, a	13	
19	Certified Court Reporter and Notary Public of the	14	
20	State of New Jersey, taken remotely via Zoom on	15	
21	December 13, 2022 commencing at 3:35 p.m.	16	
22	ESQUIRE DEPOSITION SOLUTIONS	17	
23	1384 Broadway, 22nd Floor	18	
24	New York, New York 10018	19	
25	212-687-8010	20	
		21	
		22	
		23	
		24	
		25	
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1	A P P E A R A N C E S: (VIA ZOOM)	1	JAMI SINGER, having been first duly sworn according
2	LAW OFFICE OF AHMAD KESHAVARZ	2	to law, testified as follows:
3	BY: EMMA CATERINE, ESQ.	3	DIRECT EXAMINATION BY MS. CATERINE:
4	16 Court Street, Suite 2600	4	Q. All right. Miss Singer, where do you reside?
5	Brooklyn, New York 11241	5	A. Brooklyn, New York.
6	917-945-9848	6	Q. Okay. What is your phone number?
7	E-MAIL: Emma@newyorkconsumerattorney.com	7	A. 347-401-4158.
8	For the Plaintiff, Farah Jean Francois	8	Q. And what is your e-mail address?
9	NICHOLAS GOODMAN & ASSOCIATES, PLLC	9	A. JamiSinger@gmail.com.
10	BY: NICHOLAS GOODMAN, ESQ.	10	Q. Okay. What do you know about the Victory
11	333 Park Avenue S	11	Mitsubishi dealership in the Bronx?
12	New York, New York 10010	12	MR. GOODMAN: Object to form.
13	212-227-9003	13	Q. So throughout the deposition Mr. Goodman is
14	E-MAIL: NGoodman@NGoodmanlaw.com	14	going to be -- might be making some objections,
15	For the Defendants, Victory Auto Group, LLC,	15	like objection to form. You're still required to
16	d/b/a Victory Spartan Auto Group, LLC, d/b/a	16	answer the question even after he makes those
17	Victory Mitsubishi	17	objections.
18	A L S O P R E S E N T: (VIA ZOOM)	18	A. Okay.
19	ROBERT CALVERT, NEW YORK NOTARY	19	I didn't know where -- I didn't know of them
20	AHMAD KESHAVARZ, ESQ.	20	at all until, until Emanuel LaForest asked me, can
21		21	I use your Social when you're there, when I'm there
22		22	to see if I could get the car under you as a -- as
23		23	you as my co-signer.
24		24	Q. Okay. Have you ever been to the dealership
25		25	in person?

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1	A. No.	1	Q. Okay. When he texted you asking for your
2	Q. Okay. Did you have a car on May 30th, 2020?	2	Social Security number, do you know if he was
3	A. What do you mean?	3	already at the dealership or was this before he
4	Q. Did you own or lease a car in May, on	4	went to the dealership?
5	May 30th of 2020?	5	A. He, he was actually sitting down with the
6	A. No.	6	guy, the -- to do the financing.
7	Q. Were you interested in buying a car around	7	Q. Okay. And did he tell you that over text
8	that time?	8	message or did he tell you that later?
9	A. No.	9	A. Text messages.
10	Q. Okay. Do you know Farah Jean Francois?	10	Q. Okay. Did he ask you for your driver's
11	A. No.	11	license in addition to your Social Security number?
12	Q. How do you know Emanuel LaForest?	12	A. Yes.
13	A. We used to date.	13	Q. Okay. And after you provided the driver's
14	Q. And around when did you date?	14	license and Social Security number to him did he
15	A. 2016 and we became friends.	15	tell you if he was able to get the car?
16	Q. And when did Mr. LaForest ask you -- around	16	A. He told me --
17	when did Mr. LaForest ask you if he could use your	17	MR. GOODMAN: Objection to form.
18	Social Security number?	18	A. He told me that I wasn't able to do it with
19	A. In May, 2020.	19	him and that was the last thing I heard.
20	Q. And did he -- how did he ask you that? Was	20	Q. Okay. Were you employed on May 30th, 2020?
21	it over a phone call? Was it through text message?	21	A. Yes.
22	A. Text message.	22	Q. And what were you doing at that time for
23	Q. Text message.	23	work?
24	Do you still have those text messages?	24	A. I worked for Northwell Health.
25	A. No.	25	Q. And what did you do for Northwell Health?
	Page 6		Page 8
1	Q. Okay. And prior to him asking you for your	1	A. I'm in the billing -- the revenue cycle, so I
2	Social Security number had he talked to you about	2	verify insurances and authorizations for patients.
3	getting a car?	3	Q. And around this time on May 30th, 2020 did
4	A. He did, and he said he was trying to get it	4	you ever work on Saturdays?
5	under his name and nobody -- and not anybody else.	5	A. No.
6	I said --	6	Q. Okay. And I think I may have asked this
7	(Technical interruption. The court reporter	7	before, but have you ever been inside the Victory
8	seeks clarification.)	8	Mitsubishi dealership, even if you were just there
9	A. What was I saying? He was trying to get the	9	with a friend, for example, who was buying a
10	car under his name and not put it under anybody	10	vehicle and you weren't buying a vehicle?
11	else's Social and he just asked if he could use	11	A. No, have not.
12	mine and just do a co-signer on the, on the car.	12	Q. Okay. Do you know a woman named Yessica
13	Q. Was that the first time he had ever asked you	13	Vallejo?
14	to co-sign on something or had he asked you to do	14	A. No.
15	that ever before?	15	Q. In the year 2020 did you attempt to purchase
16	A. He asked me before, but I went with him to go	16	any cars for yourself or co-signing for another
17	get the car.	17	person besides what we talked about with Emanuel
18	Q. I see. And what dealership was that, if you	18	LaForest?
19	remember?	19	A. No.
20	A. Major World.	20	Q. What were you doing on the morning of
21	Q. Major World in Queens?	21	May 30th, 2020?
22	A. Yes.	22	A. I was with my family.
23	Q. And around when did you go to Major World	23	Q. And is your family in Brooklyn?
24	with him?	24	A. Yes, and Long Island.
25	A. I would say, like, March, 2019.	25	Q. Okay. Do you remember if you were in

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<p style="text-align: right;">Page 9</p> <p>1 Brooklyn or Long Island on May 30th? 2 A. No, I don't. 3 Q. That's fine. It is a long time ago, I 4 understand. 5 Generally on Saturdays during this time 6 period, May 30th, 2020, you know, this is right 7 after the pandemic started, what were you doing on 8 Saturdays at that time, generally speaking? 9 A. We just started getting my family together 10 and we were just hanging out inside the house, 11 probably. I'm not too sure, but I do have pictures 12 of my family, me with them, so that's how I know. 13 Q. I see. So you have pictures dated from 14 May 30th, around that time? 15 A. Yes. 16 Q. Okay. And do you remember what you were 17 doing specifically that day? Was it just hanging 18 out? 19 A. I was with my nieces and my nephews, so when 20 I'm with my nieces and my nephews I'm only with 21 them. Like, I don't leave. I don't run out of the 22 house to leave them in the house. I just hang out 23 with them, cause I'm the cool aunt, the fun aunt. 24 Q. How many nieces and nephews do you have? 25 A. Quite a few.</p>	<p style="text-align: right;">Page 11</p> <p>1 Q. A few days after he was arrested? 2 A. I didn't until a few days after. 3 Q. And was he the one who told you about it? 4 A. He just told me there was an issue with the 5 car that he just got and that's all he said. 6 Q. Okay. And when did you find out about this 7 lawsuit? 8 A. The day your office called me. 9 Q. I see. 10 MR. GOODMAN: For the record, can the 11 record reflect Mr. Keshavarz just waved, made some 12 kind of waving gesture like that with the -- and 13 smiled. I'm not sure what the meaning is, but I'd 14 just like that -- 15 MR. KESHAVARZ: Do you remember who you 16 spoke with? 17 THE WITNESS: You. 18 MR. GOODMAN: Let's have one attorney 19 ask the questions. 20 MR. KESHAVARZ: All right. 21 MR. GOODMAN: Now he's laughing 22 uproariously. 23 MR. KESHAVARZ: Mystery solved. Thanks. 24 Q. So the day that Mr. LaForest texted you 25 saying -- asking if he could use your Social</p>
<p style="text-align: right;">Page 10</p> <p>1 Q. So were you with them the whole day on 2 May 30th? 3 A. Yes. 4 Q. Did you have dinner with them? 5 A. Yes. 6 Q. Do you remember what you had for dinner? 7 A. No. 8 MR. GOODMAN: Objection. Come on. 9 Q. And on the night of May 30th, 2020 were you 10 at your own home? Were you at a family member's 11 home? Do you remember? 12 A. Either my home or a family member's home. I 13 don't remember. 14 Q. Okay. When did you learn that Mr. LaForest 15 had purchased a vehicle from Victory Mitsubishi? 16 A. I had no idea. 17 Q. In the year 2020 did you ever see Mr. 18 LaForest driving a vehicle? 19 A. No. 20 Q. Did you see Mr. LaForest at all in person in 21 the year 2020? 22 A. No. 23 Q. Did you know that Mr. LaForest was arrested 24 in connection to the purchase of this vehicle? 25 A. I didn't until a few days later.</p>	<p style="text-align: right;">Page 12</p> <p>1 Security number and driver's license to purchase a 2 vehicle, you said that was in May of 2020, correct? 3 A. Yes. 4 Q. And did you respond to him on the same day 5 with your Social Security number and a picture of 6 your driver's license? 7 A. Yes. 8 Q. Okay. Did Mr. LaForest ever mention trying 9 to purchase a vehicle with your Social Security 10 number and driver's license in September of 2020? 11 A. No. 12 Q. All right. I am going to attempt to share 13 the screen now. Everyone wish me luck because I am 14 very technologically inept. 15 Miss Singer, can you see what's on the screen 16 right now? 17 A. Yes. 18 Q. Okay. My first question is, do you recognize 19 this phone number, starting with 347? 20 A. Maybe it was one of the text free apps I 21 used. Maybe I did. I don't remember. 22 Q. Okay. If you don't, if you don't know, 23 that's fine. Just -- we don't want you to guess at 24 anything. Just say what you know. 25 A. All right.</p>

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1 Q. And I can zoom in more if you would like me 2 to, but is this a picture of your driver's license 3 on the screen? 4 A. Yes. 5 Q. Okay. And this number right here ending with 6 2305, is that your Social Security number? 7 A. Correct. 8 MS. CATERINE: Okay. I would just like 9 to reflect for the record that I was showing the 10 witness Exhibit 25, Bates stamped Defendants 70 11 through 72. 12 Q. Let's see if I could figure out how to do 13 this. 14 Okay. Miss Singer, has Victory Mitsubishi 15 ever contacted you by phone for any reason? 16 A. No. 17 Q. Has Victory Mitsubishi ever contacted you by 18 e-mail for any reason? 19 A. No. 20 Q. Have you ever received any letters from 21 Victory Mitsubishi? 22 A. No. 23 Q. And you said that you went to Major World 24 in -- with Mr. LaForest in March of 2019? 25 A. Yes.	1 A. Yes. 2 Q. I see. 3 MS. CATERINE: Okay. I don't have any 4 more questions for this witness. Mr. Goodman, do 5 you have any questions now? 6 MR. GOODMAN: Yeah, I do. 7 CROSS EXAMINATION BY MR. GOODMAN: 8 Q. Good afternoon, Miss Singer. Again, my name 9 is Nicholas Goodman and I do represent the 10 defendants in the case that Farah Jean Francois 11 brought against them, the reason you're here today. 12 You said at the beginning of your testimony 13 you reside in Brooklyn, New York. Could you give 14 us your street address, please? 15 A. [REDACTED] 16 Q. Okay. How long have you lived at that 17 address? 18 A. 31 years. 19 Q. Okay. And what is your date of birth? 20 A. [REDACTED] 21 Q. Okay. Thank you. 22 You gave a phone number, that was 23 347-301-4158. Did I get that correct? 24 A. No. It's 347-401-4158. 25 Q. Okay. Glad I asked.
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1 Q. Did you go to any other car dealerships with 2 Mr. LaForest? 3 A. No. 4 Q. And do you remember what day it was in May of 5 2020 that you texted with Mr. LaForest? 6 A. I'm not too sure what day. 7 Q. Do you remember what day of the week it was? 8 A. No. 9 Q. Do you remember if it was towards the end of 10 the month or towards the beginning of the month? 11 A. I'm not too sure. 12 Q. Okay. And you said you were with your 13 nephews and nieces on May 30th, 2020, correct? 14 A. Yes. 15 Q. Were you babysitting them or were you with 16 more family members? What was it? I'm sorry. 17 A. I was with more family members. 18 Q. I see. Do you still have those pictures from 19 May 30th of 2020? 20 A. Yes. 21 Q. Okay. Could you provide those pictures to 22 us? 23 A. Sure, but I'm not in them. It's just 24 pictures of my nieces and nephews that I took. 25 Q. I see. Taken with your phone?	1 Is that the same number that you used -- 2 strike that. 3 Is that a cell phone number, I assume? 4 A. Yes. 5 Q. Is that the same number you were using in May 6 of 2020? 7 A. Yes. 8 Q. And who is your cell phone provider? Who is 9 it today? 10 A. Verizon. 11 Q. And who was it in May of 2020? I'm sorry. 12 A. Verizon. 13 Q. Yeah. You break up sometimes. Sorry about 14 that. 15 Do you have the same actual phone, the same 16 piece of hardware today that you had in May of 17 2020? 18 A. No. 19 Q. Okay. What happened to that phone that you 20 did have in May of 2020? 21 A. I got a new phone. 22 Q. All right. Now, you testified about some 23 pictures that you have of your nieces from May 30th 24 of 2020. Are they -- and you said they're on your 25 phone. They're on your current phone; is that

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1 correct?	1 Q. Okay.
2 A. Yes.	2 A. -- almost every single weekend.
3 MS. CATERINE: Objection to form.	3 Q. Okay. But somehow you were fixated on the
4 Q. Okay. So they transferred over from your old	4 May 30th in this deposition, right?
5 phone to the -- they were taken -- strike that.	5 A. I guess, but no.
6 Those pictures were taken on your cell phone,	6 Q. That's not something that Mr. Keshavarz ever
7 correct?	7 suggested to you, right?
8 A. Yes, and it was saved to my Google drive, my	8 A. No.
9 Google photos, and that's why I still have it.	9 Q. Is that what you're saying?
10 Q. Okay. So when Miss Caterine asked you	10 A. Yes.
11 questions about May 30th of 2020, you already knew	11 Q. When is the first time you spoke to Mr.
12 that you had pictures from that exact date,	12 Keshavarz?
13 correct?	13 A. The week he called me to see if I could do
14 A. Yes.	14 this, do this deposition.
15 Q. So you must have looked for them before	15 Q. When was that?
16 today, correct?	16 A. Two weeks ago, I believe.
17 A. Yes.	17 Q. Okay.
18 Q. And is that something that Miss Caterine or	18 A. I'm not -- I don't really remember.
19 Mr. Keshavarz asked you to do?	19 Q. And tell me about that conversation. What
20 A. No.	20 did he say to you? What did you say to him?
21 Q. How did you come about looking for those	21 A. He was just asking me if I ever went down to
22 photographs before today's deposition?	22 the dealership, if I gave Emanuel LaForest the okay
23 A. I was looking for photos of my cousin who	23 to use my Social and, my Social Security number and
24 recently passed away in March of 2020.	24 my driver's license and I said yes and then he --
25 Q. Okay. And how did you come to find those	25 and then that was it.
1 exact photos on that exact day, May 30th of 2020?	Page 20
2 A. Because I was looking at the videos for my	1 Q. Okay. That's the whole conversation you had
3 nieces and nephews that they made.	2 with him?
4 Q. Okay. So before -- you also testified that	3 A. And how do I know Emanuel LaForest. That was
5 you don't know the day that Mr. LaForest texted you	4 it.
6 about your Social Security number and your driver's	5 Q. Okay. Did he ever suggest the date of
7 license, right?	6 May 30th, 2020?
8 A. Correct.	7 A. No.
9 Q. So you don't know if that was May 30th or	8 Q. He never said that day?
10 not, correct?	9 A. No.
11 MS. CATERINE: Objection to form.	10 Q. Okay.
12 Q. I'm sorry. What was the answer?	11 A. I only know that because of the Credit Karma
13 A. Correct.	12 thing that was on my -- when I looked at my Credit
14 Q. And you don't know if that was a Saturday or	13 Karma, that's when I saw the credit run.
15 any other day of the week, correct?	14 Q. Okay. When you say he asked you about
16 MS. CATERINE: Objection to form.	15 whether you had given your Social Security number
17 Q. What was the answer?	16 and driver's license to Emanuel LaForest, you said
18 A. Correct.	17 you had, correct?
19 Q. But somehow at this deposition you knew	18 A. Yes.
20 exactly what you were doing on May 30th of 2020,	19 Q. And you were okay with that, you gave Emanuel
21 right?	20 LaForest your permission to use your Social
22 MS. CATERINE: Objection to form.	21 Security number and driver's license, correct?
23 Q. You can answer.	22 MS. CATERINE: Objection --
24 A. When my cousin passed away I spent time with	23 A. Correct.
25 my nieces and my nephews and my family --	24 MS. CATERINE: -- to form.
	25 Q. Again, for some reason when you speak Emma

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1 steps over the witness. Was the answer yes?	1 A. Just friends. Just friends.
2 A. Yes.	2 Q. Just friends or best friends?
3 Q. Okay. So you were willing to co-sign the	3 A. Just, J-U-S-T.
4 loan with Mr. LaForest in May of 2020 for the	4 Q. Just friends, okay.
5 purchase of the vehicle, correct?	5 Where does he live now?
6 A. Correct.	6 A. I don't know.
7 Q. And you, in fact, had previously done that at	7 Q. Okay. What's his phone number today?
8 Major World in 2019, I believe you said?	8 A. I would have to look in my phone for that.
9 A. Yes. I went with him.	9 Q. Yeah. Could you do that, please?
10 Q. Right. And you -- were you a co-signer on	10 A. It is 718-213-0288.
11 the vehicle loan, on the financing for the vehicle	11 MS. CATERINE: Could we just have the
12 that was purchased at Major World?	12 record reflect that she was reading that from her
13 MS. CATERINE: Objection to form.	13 phone, please?
14 Q. Okay. That's what's happening. I don't know	14 Q. Okay. When is the last time you saw Mr.
15 what the problem is, but go ahead.	15 LaForest in person?
16 A. Yes.	16 A. 2021.
17 Q. Are you still obligated for payments on that	17 Q. What month in 21?
18 loan?	18 A. I don't remember.
19 A. No.	19 Q. Okay. When is the last time you spoke with
20 Q. What happened to that loan?	20 Mr. LaForest?
21 A. From what he told me was that they -- he	21 A. I would say I just spoke to him yesterday and
22 traded in that car.	22 then before that a few times here and there.
23 Q. Okay. When did he tell you that?	23 Q. What did you speak to him about yesterday?
24 A. In the Summertime of 2019.	24 A. How's his job going and just to check-up on
25 Q. Okay. And what bank or financial institution	25 him.
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1 financed that purchase of that vehicle?	1 Q. Okay. Is it your testimony you haven't
2 A. I believe Credit -- Capital One.	2 spoken to him about this case?
3 Q. Okay. Did you ever receive any	3 A. No.
4 correspondence or documentation from Capital One	4 Q. He never brought that up, right?
5 about that loan?	5 A. No.
6 A. I don't remember.	6 Q. Okay. Are you aware of Mr. LaForest's
7 Q. Okay. Did you ever get anything from Capital	7 criminal convictions?
8 One that said the loan was terminated or rescinded	8 MS. CATERINE: Objection to form.
9 or paid off?	9 A. No.
10 A. I don't remember.	10 Q. You know he's been convicted of crimes,
11 Q. Okay. And you mentioned that -- strike that.	11 correct?
12 Other than the conversation you told us about	12 MS. CATERINE: Objection to form.
13 with Mr. Keshavarz did you have any other	13 A. When we first started dating he was in jail
14 conversations with him?	14 but that was about it. That's all I know.
15 A. No.	15 Q. When did he get out of jail?
16 Q. When is the first time you spoke to Miss	16 A. April, 2017.
17 Caterine?	17 Q. How did it come about that you began dating
18 A. Today.	18 him while he was in jail?
19 Q. Okay. Did you speak to anyone else from	19 MS. CATERINE: Objection to form.
20 their office, Law Office of Ahmad Keshavarz?	20 A. He wasn't in jail when we started dating. He
21 A. No.	21 was out of jail when we started dating and then he
22 Q. All right. Could you tell us now, what is	22 ended up going to jail.
23 your present relationship with Emanuel LaForest?	23 Q. Okay. How long was he in jail?
24 A. Just friends.	24 A. From December to April.
25 Q. Best friends, okay.	25 Q. Okay. Do you know why he was in jail?

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1 A. No.	1 MS. CATERINE: Objection to form.
2 Q. Okay. So you said -- you used the term	2 Q. -- of 2020?
3 dating at various points. Did there come a point	3 A. Correct. I was never told.
4 when you stopped dating Mr. LaForest and became	4 Q. Okay. Did he ever -- did you ever get a ride
5 just friends?	5 in his BMW vehicle?
6 A. Yes. In December, 2018.	6 A. No. No.
7 Q. Okay. So when you co-signed the loan with	7 Q. Okay. And then he later told you, you said,
8 him at Major World you were just friends, correct?	8 correct me if I'm wrong, that there had been a
9 A. Yes.	9 problem with the vehicle and he had been arrested,
10 Q. I didn't hear an answer.	10 correct?
11 A. Yes.	11 MS. CATERINE: Objection to form.
12 Q. Okay. Now, did you ever -- when you were	12 A. No. He didn't tell me anything to it.
13 dating did you ever live together with Mr.	13 Q. I didn't get the answer.
14 LaForest?	14 A. He told me he was arrested but he didn't tell
15 A. No.	15 me anything regarding to why he was arrested.
16 Q. Did you ever visit him at his address on	16 Q. I thought you said it was about the vehicle,
17 Farragut Road in Brooklyn?	17 there was a problem with the purchase of the
18 A. Yes.	18 vehicle?
19 Q. How many times did you visit there?	19 A. No.
20 A. While we were dating?	20 Q. Okay. When you said he told you he was --
21 Q. Yes.	21 had been arrested, when was that?
22 A. All the time.	22 A. I don't even remember. I don't remember.
23 Q. Okay. Did you sleep over there? Spend the	23 Q. Okay. Did he tell you that in person?
24 night there?	24 A. No.
25 A. Like twice.	25 Q. How did he tell you that?
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1 Q. Okay. And when you say all the time, was	1 A. He called me.
2 that once a week? Twice a week? You tell me.	2 Q. He called you on the phone?
3 A. We were together almost all the time.	3 A. Yeah.
4 Q. Okay. Including at that address, correct?	4 Q. Okay. And what did you do in response to
5 A. Yes.	5 being told that he had been arrested?
6 Q. All right. Who else lived there, at that	6 A. I said okay, are you okay, and then that was
7 address?	7 it.
8 A. His parents, brother, aunt, cousin,	8 Q. Okay. Did he ask you for any money for bail,
9 grandparents.	9 anything like that?
10 Q. Okay. Was his brother Stanley LaForest?	10 A. No.
11 A. Yes.	11 Q. Okay. Now, you also, you mentioned that he,
12 Q. Okay. Do you know him?	12 Emanuel LaForest had asked you for your driver's
13 A. Yes.	13 license. Did he ask for your -- for you to send
14 Q. When is the last time you spoke to him?	14 him, text him a photograph of your driver's license
15 A. A while ago.	15 or just a driver's license number or what?
16 Q. Okay. And do you know Mr. LaForest's wife?	16 A. He asked me to send him the photo of my
17 A. No.	17 driver's license.
18 Q. Okay. Was his wife there, at that Farragut	18 Q. Okay. And he also asked for your Social
19 Road address when you were there with Mr. LaForest,	19 Security number?
20 Emanuel LaForest?	20 A. Correct.
21 A. No.	21 Q. Didn't he already have that from before, at
22 Q. Okay. Now -- strike that.	22 Major World?
23 Is it your testimony that Mr. LaForest never	23 A. No.
24 told you that he actually purchased a vehicle on	24 Q. Okay. Had you ever entered into any other
25 May 30th of 2020, or in May --	25 loan or financial arrangement with Mr. LaForest?

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1	A. No.	1	Q. Where was that?
2	Q. Okay. And you said that when he texted you	2	A. Abraham Lincoln High School.
3	from -- on May 30th he was, what you said was	3	Q. Okay. Have you had any education after high
4	"sitting with the guy". How do you know it was a	4	school?
5	guy?	5	A. Yes. I'm in college now.
6	A. I was just saying that he was just sitting	6	Q. Which college?
7	with the -- because I forgot the word, how to do	7	A. I'm doing on-line school, Ashworth.
8	it -- the sales rep.	8	Q. What's it called?
9	Q. Okay. So you don't know if the sales rep was	9	A. It's called Ashworth.
10	a man or a woman?	10	Q. Ashworth, okay.
11	A. Correct.	11	Other than that, do you have any
12	MS. CATERINE: Objection to form.	12	certifications, nursing or health care or anything
13	Q. You don't know the name of the sales rep?	13	in that regard?
14	A. No.	14	A. No. I just been working.
15	Q. What did Mr. LaForest text you -- you didn't	15	Q. Okay. Who's your employer?
16	have an actual conversation with him that day, did	16	A. Northwell.
17	you?	17	Q. And how long have you been with Northwell?
18	A. No.	18	A. Since January of 2019.
19	Q. Or did you?	19	Q. Okay. And when did you graduate Abraham
20	Okay. Did he text you any, anything else	20	Lincoln High School?
21	other than the question or the request that you	21	A. 2009.
22	send him your Social Security number and a photo of	22	Q. What did you do between 2009 and January,
23	your driver's license?	23	2019?
24	A. No.	24	A. I was in and out of Kingsborough. I would go
25	Q. Okay. That was it? Your testimony is you	25	and then I would stop. I would work. I always
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1	don't know what happened after that?	1	worked. I either worked two jobs or one job.
2	A. No, I don't.	2	Q. Okay. What kind of work?
3	Q. Okay. What's your understanding of why	3	A. I did -- I was working at Party City, Lowe's,
4	you're here today?	4	then I worked at an after-school program and then I
5	A. They explained to me that something with the	5	started working in the health care. I started
6	dealership, how somebody was -- how Francis,	6	doing phys -- I became a physical therapy aide and
7	whatever her name is, is -- Farah, that somebody --	7	then went into, then went into dermatology and then
8	wow, I can't even talk right now. That the car was	8	went to pain management and now I'm at North,
9	purchased under her and she wasn't there and they	9	Northwell Health.
10	just wanted to know if I was there and my Social	10	Q. Right. Have you ever been married?
11	and driver's license was also used.	11	A. Nope.
12	Q. Okay. So all that was explained to you by	12	Q. Do you have any children?
13	Mr. Keshavarz?	13	A. No.
14	A. Yes.	14	Q. The last time you saw Emanuel LaForest, where
15	Q. So you did have more of a conversation with	15	was that?
16	him than you told us before --	16	A. In Flatbush.
17	MS. CATERINE: Objection to form.	17	Q. Was it that Farragut Road address, that 2940
18	Q. -- correct?	18	Farragut --
19	A. He just explained to me why and that I	19	A. No.
20	needed -- that the testimony. That was it.	20	Q. -- Road?
21	Q. Okay. Have you ever been arrested yourself?	21	No, okay.
22	A. No.	22	And he told you he had been arrested. Did he
23	MS. CATERINE: Objection to form.	23	ever tell you what happened to his case?
24	Q. Did you graduate from high school?	24	A. He never told me nothing about the case.
25	A. Yes.	25	Q. Okay. So did he ever tell that you Farah

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1 Francois had approved his purchase of a vehicle	1 you explain that?
2 after the fact, after he had purchased it?	2 MR. GOODMAN: Objection to form.
3 MS. CATERINE: Objection --	3 A. When -- I forget. I don't know how to say
4 A. No.	4 his name. When Mr. --
5 MS. CATERINE: -- to form.	5 Q. Keshavarz.
6 Q. Okay. Give me one second here.	6 A. Keshavarz, when he called me he asked me --
7 A. Just a quick question. Do you know how much	7 when he was asking me the question, I said I just
8 longer is this gonna be?	8 have the Credit Karma report and that's when I know
9 Q. I'm not gonna be more than a minute here.	9 what date my credit was ran from Victory.
10 A. Oh, okay.	10 Q. Okay. And was that date May 30th, 2020?
11 Q. I can't speak for Miss Caterine.	11 A. Yes.
12 MS. CATERINE: I probably just have one	12 Q. And so based on your credit being run on
13 more question for you once Mr. Goodman is done and	13 May 30th, 2020 do you think your text messages with
14 then you'll be free to go.	14 Emanuel LaForest were on or around May 30th, 2020?
15 THE WITNESS: Okay. No problem.	15 MR. GOODMAN: Object to form.
16 Q. Okay. Miss Singer, do you own a motor	16 A. I think, yes.
17 vehicle today?	17 Q. Okay. No more questions. Thank you, so
18 A. No.	18 much, Miss Singer.
19 Q. Okay. And you did not on May -- in May of	19 A. Thank you.
20 2020, either?	20 RECROSS EXAMINATION BY MR. GOODMAN:
21 A. Correct.	21 Q. Miss Singer, I have one more question.
22 Q. Okay. You have a driver's license, I think	22 A. Okay.
23 we saw a picture of it, correct?	23 Q. When did you pull the Credit Karma report?
24 A. Correct.	24 A. The day I got the phone call.
25 Q. Okay. Do you ever use that driver's license	25 Q. Right. So that's something Mr. Keshavarz put
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1 for purposes of driving a motor vehicle?	1 you up to, correct?
2 A. Yes. I'm under my dad's policy.	2 MS. CATERINE: Objection to form.
3 Q. Okay. So you have access to your dad's car?	3 MR. KESHAVARZ: Objection. Form.
4 A. Yes.	4 MR. GOODMAN: Yeah. You're not
5 Q. Where does your dad live?	5 participating, Ahmad. Please be quiet.
6 A. With me.	6 Q. Did you -- is that correct? That's something
7 Q. So you have -- who do you live with there?	7 he asked you to do?
8 A. My mom and dad.	8 MS. CATERINE: Objection to form.
9 Q. Okay. And was that the same in May of 2020,	9 A. Not -- no.
10 that you had access to your dad's car?	10 Q. What do you mean not, no?
11 A. Yes.	11 A. He didn't. I asked -- he asked if it was ran
12 Q. What kind of vehicle is that?	12 and I said I don't know and then I looked myself.
13 A. A Jeep Compass.	13 Q. Okay. That's fine.
14 Q. Did you ever give Mr. LaForest a ride in your	14 Thank you. No more questions.
15 Jeep Compass, your dad's Jeep Compass?	15 MS. CATERINE: All right. Thank you,
16 A. Yes.	16 Miss Singer. Have a good day.
17 Q. When was that?	17 MR. KESHAVARZ: Thank you for your time.
18 A. Years ago.	18 (At 4:23 p.m. proceedings were
19 Q. Okay.	19 concluded.)
20 A. Probably 2019.	20
21 Q. I have no more questions.	21
22 REDIRECT EXAMINATION BY MS. CATERINE:	22
23 Q. Okay. Miss Singer, just following up, you	23
24 mentioned something about Credit Karma to Mr.	24
25 Goodman when he was asking you questions. Could	25

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1 CERTIFICATE	1 E R R A T A
2	2
3 I, MICHELLE GRUENDEL, a Certified Court	3 I wish to make the following changes, for
4 Reporter and Notary Public of the State of New	4 the following reasons:
5 Jersey, do hereby certify that the foregoing is a	5
6 true and accurate transcript of the testimony as	6 PAGE LINE
7 taken stenographically and digitally at the time,	7 _____ CHANGE: _____
8 place and on the date hereinbefore set forth, to	8 _____ REASON: _____
9 the best of my ability.	9 _____ CHANGE: _____
10 I DO FURTHER CERTIFY that I am neither a	10 _____ REASON: _____
11 relative nor employee nor attorney nor counsel of	11 _____ CHANGE: _____
12 any of the parties to this action, and that I am	12 _____ REASON: _____
13 neither a relative nor employee of such attorney or	13 _____ CHANGE: _____
14 counsel, and that I am not financially interested	14 _____ REASON: _____
15 in the action.	15 _____ CHANGE: _____
16	16 _____ REASON: _____
17	17 _____ CHANGE: _____
18 <i>Michele Gruendel</i>	18 _____ REASON: _____
19	19 _____ CHANGE: _____
20 MICHELLE GRUENDEL, C.C.R.	20 _____ REASON: _____
21 C.C.R. License No. 30X100190500	21
22 Notary Public of the	22
23 State of New Jersey	23 WITNESS' SIGNATURE DATE
24	24
25	25
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1 J U R A T	
2	
3 I have read my testimony in the	
4 foregoing transcript and believe it to	
5 be true and correct to the best of my	
6 knowledge and belief.	
7	
8 _____	
9 Witness	DATE
10	
11	
12 SUBSCRIBED and SWORN to before me this _____	
13 day of _____, 2022, in the	
14 jurisdiction aforesaid.	
15 _____	
16 My Commission Expires	Notary Public
17	
18	
19	
20	
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